

Public Comment regarding the Energy Policy Review Commission's mandate.

The Energy Policy Review Commission was established by an amendment to the "competitively priced electricity bill" on June 27, 2012. The purpose of the EPRC is to "promote public transparency regarding the effectiveness of energy and electricity policies and programs." The Commission is charged with researching and reviewing the economic and environmental benefits as well as the economic and electricity cost implications of energy and electricity policies. The concept of a Commission was based on a proposal for a "Renewable Energy Investment Commission" filed as a bill during the 2011-2012 legislative session. The proposed legislation was designed to investigate the cumulative costs of the green initiatives found in five Massachusetts laws: the oceans act, the green communities act, the clean energy biofuels act, the global warming solutions act, and the green jobs act.

Instead of the "electricity cost reduction review" commission in the original proposed bill, we have the "energy policy review" commission. The scope of the EPRC is now to concentrate on the effectiveness of the current energy policies without examining the economic cost.

Since passage of the "competitively priced electricity bill," the portion of my electric bill that pays for transmission (cost of the electricity from a generator to my utility's distribution lines) has increased 24%. The transition charge on my electric bill (the utility company's payments to its wholesale supplier for terminating its wholesale contracts) has increased 92% - almost doubled in one year.

Anyone who uses electricity in Massachusetts pays for the same electricity multiple times: through federal subsidies supported by income taxes and through state subsidies supported by a tax on Massachusetts utility bills. The utility user pays for the same electricity by paying for the actual electricity used and then also paying for the backup electricity power plants that are idling in case the wind does not blow or the sun does not shine.

Federal subsidies have gone to wind developers in Massachusetts through different mechanisms including American Resource and Recovery Act (ARRA) stimulus funding and Production Tax Credits.

Examples of Massachusetts projects that used federal ARRA stimulus funds are: Falmouth Wind 2, the MWRA turbine in Charlestown, the Balboni turbine in Plymouth, the Notus turbine in Falmouth, Templeton's Municipal Light turbine, and the three "No Fossil Fuel" turbines in Kingston.

Examples of developers using the federal Production Tax Credit are D&C Construction, the developer of the single Ipswich II wind turbine, and the Spanish Company Iberdrola, who qualified for PTC last December when they started operating their 19 turbine Hoosac Wind project.

State grants have also gone to wind developers from the Renewable Energy Trust which is funded by taxes on all electricity utility bills. More than \$14 million dollars has been spent on 32 RET grants for operating wind projects. More than \$5 million dollars of rate payers monies were granted to wind projects that never got off the ground.

The largest RET grant was over 3 million dollars for Falmouth Wind 1. That turbine exceeded the state's air noise regulation and is only running limited hours.

Over \$1 million of rate-payers money was spent for the two North Central Correctional Institute turbines in Gardner. There was a delay in operation waiting for a \$1.7 million electrical connection to a substation to be completed. That upgrade was funded by the Division of Capital Asset Management (DCAM) and the Department of Correction (DOC).

One-half million dollar grants from rate-payer tariffs were given to single turbines such as the Jiminy Peak turbine and the Scituate Community Wind turbine. One-half million dollar grants were awarded to small turbines such as the Mass Maritime turbine in Bourne and the Williams Stone Company turbine in Otis.

All references to rate payer- and taxpayer-funded programs were removed from the final legislation establishing the EPRC. This obfuscates the fact that wind energy must rely on subsidies.

If the purpose of the EPRC is to “promote public transparency regarding the effectiveness of energy and electricity policies and programs,” why have none of these Massachusetts wind projects revealed to the public how much electricity they have actually produced? The original text for the Commission called for the investigation of renewable energy capacity. That text was removed from the Commission’s charge. Is that because capacity factors for wind in Massachusetts are notoriously low? The ones whose production has been published by the Energy Information Administration have an average capacity of 23%.

The Commission is not empowered to report on reforms that could be implemented to the “green initiatives” but instead is to report on the “further” expansion of the Commonwealth’s renewable energy portfolio. Rather than work to reduce all costs associated with the energy programs, the Commission’s role is to advise on reducing “administrative” costs.

I have heard no discussion about increasing the reliability of electricity, but the phrase “while ensuring a diverse energy portfolio” was added to the Commission’s charge. Because the reliability of electricity is complicated by wind turbines, wind energy proponents use the mantra “diverse energy portfolio” to insure that wind turbines continue to be part of the energy mix. Even though Massachusetts ranks 35th in the nation for wind resources, there is an insistence on trying to site wind turbines in the 3rd most densely populated state in the country. This practice has resulted in industrial scale wind turbines in residential neighborhoods. The result is sleep deprivation and adverse health effects at 21 different wind projects now operating in Massachusetts.

Hydroelectric is hardly mentioned in diversifying the energy portfolio. Massachusetts has an abundance of flowing water. There are 8,000 unpowered dams in New England that could be converted to hydroelectric projects. This would not only diversify the energy portfolio with reliable energy but provide local jobs and put money into local economies.

Thank you for your time and consideration.

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